# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION KEVIN P. WEIMER, Clerk By: TCC Deputy Clerk

UNITED STATES OF AMERICA

v.

Criminal Action No. 1:23-MJ-962

SEAN PATRICK CIRILLO

#### Government's Motion for Detention

The United States of America, by counsel, Ryan K. Buchanan, United States Attorney, and Lauren T. Macon, Assistant United States Attorney for the Northern District of Georgia, moves for detention under 18 U.S.C. §§ 3142(e) and (f).

## 1. Eligibility of Case

This case is eligible for a detention order because this case involves:

A crime of violence (18 U.S.C. § 3156);

A serious risk that the defendant will flee.

#### 2. Reason for Detention

The Court should detain defendant because there are no conditions of release that will reasonably assure the appearance of the person as required and the safety of any other person and the community.

## 3. Rebuttable Presumption

The United States will not invoke the rebuttable presumption that no condition or combination of conditions will reasonably assure the appearance of the

defendant as required and the safety of the community pursuant to 18 U.S.C. § 3142(e)(3).

The United States will not invoke the rebuttable presumption that no condition or combination of conditions will reasonably assure the safety of any other person and the community pursuant to 18 U.S.C. § 3142(e)(2).

## 4. Time for Detention Hearing

The United States requests the Court conduct the detention hearing after continuance of 3 days.

The United States requests leave of Court to supplement this motion with additional grounds or presumptions for detention.

Dated: November 13, 2023.

Richard Russell Federal Building 75 Ted Turner Drive S.W., Suite 600 Atlanta, Georgia 30303-3309

Phone: (404) 581-6000 Fax: (404) 581-6181

(404) 581-6289

Respectfully submitted,

RYAN K. BUCHANAN United States Attorney

LAUREN T. MACON

Assistant U.S. Attorney

Ga. Bar No. 763604

# Certificate of Service

I served this document today by handing a copy to defense counsel.

November 13, 2023

/s/LAUREN T. MACON

LAUREN T. MACON
Assistant U.S. Attorney